

# MEMO ENDORSED

## Federal Defenders OF NEW YORK, INC.

Southern District  
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June 2, 2022

### **BY ECF**

Honorable Valerie E. Caproni  
United States District Judge  
Southern District of New York  
New York, New York 10007

**Re: United States v. Felix Gomez  
22 Cr. 176 (VEC)**

Dear Judge Caproni:

I am the attorney for Felix Gomez, the defendant in the above-captioned case, and write to request a 45-day adjournment of the motion schedule. As of now, the defense's motions are due tomorrow; however, the defense is still preparing a mitigation submission on Mr. Gomez's behalf, which was delayed due to the untimely fulfillment of records requests. While the defense anticipates filing the mitigation submission soon, a 45-day adjournment will hopefully be sufficient time to also allow the prosecution to consider the application.

I have conferred with AUSA Edward Robinson and I understand that he does not object to this adjournment. Thank you for your consideration of this request.

Respectfully Submitted,

/s/ Marisa K. Cabrera  
Marisa K. Cabrera, Esq.  
Assistant Federal Defender  
Tel.: (917) 890-7612

cc: AUSA Edward Robinson (by ECF)

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DOCUMENT  
ELECTRONICALLY FILED  
DOC #:  
DATE FILED: 6/2/22

Application GRANTED. The deadline for pretrial motions is hereby ADJOURNED from June 3, 2022, until **July 20, 2022**. The deadline for memoranda in opposition is hereby ADJOURNED from July 1, 2022, until **August 15, 2022**. The deadline for memoranda in reply is hereby ADJOURNED from July 13, 2022, until **August 29, 2022**.

SO ORDERED.

A handwritten signature in blue ink, appearing to read "Valerie Caproni", with a date "6/2/22" written below it.

HON. VALERIE CAPRONI  
UNITED STATES DISTRICT JUDGE